

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BOWEN, MICLETTE, & BRITT INSURANCE
AGENCY, LLC, BOWEN, MICLETTE, &
BRITT OF LOUISIANA, LLC and DAVID B.
GORNEY,

Plaintiffs,

vs.

MARSH USA INC. AND MARSH &
MCLENNAN COMPANY,

Defendants.

Case No. 15-cv-07434 (PAE) (JCF)

**NOTICE OF DEFENDANTS'
MOTION TO DISMISS PLAINTIFFS'
COMPLAINT PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 12(b)(1) AND 12(b)(6)**

To: William S. Helfand, Esq.
C. Larry Carbo, III, Esq.
Cody N. Schneider, Esq.
Chamberlain, Hrdlicka, White, Williams & Aughtry
1200 Smith St., Suite 1400
Houston, Texas 77002

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss Plaintiffs' Complaint and the Declaration of Clifford R. Atlas, as well as the exhibits attached thereto, Defendants Marsh USA Inc. and Marsh & McLennan Companies, Inc. (incorrectly named herein as "Marsh & McLennan Company") (collectively "Defendants"), by their undersigned attorneys, will move this Court before the Honorable Judge Paul A. Engelmayer at the United States District Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, on a time and date to be determined by the Court, for an Order: (1) dismissing Plaintiffs' claims in their entirety with prejudice; and (2) granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

JACKSON LEWIS P.C.

666 Third Avenue, 29th Floor
New York, New York 10017
(212) 545-4000

By: 

Clifford R. Atlas
Suzanne E. Peters

ATTORNEYS FOR DEFENDANTS

Dated: October 1, 2015
New York, New York